

# Exhibit 21

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE ) Case No. 07-5944 (SC)  
(CRT) ANTITRUST LITIGATION, )

\_\_\_\_\_ ) MDL No. 1917  
)

This Document Relates to: )  
)

ALL ACTIONS )

ORAL AND VIDEOTAPED DEPOSITION OF  
JOHN O'DONNELL  
MAY 20, 2014

VIDEOTAPED DEPOSITION of JOHN  
O'DONNELL, produced as a witness at the instance of  
the Defendants LG Electronics, Inc. and LG Electronics  
U.S.A., Inc., and duly sworn, was taken in the  
above-styled and numbered cause on the 20th of May,  
2014, from 8:57 a.m. to 6:50 p.m., before Audra B.  
Paty, CSR in and for the State of Texas, reported by  
machine shorthand, at the offices of Susman Godfrey  
LLP, 901 Main Street, Suite 5100, in the City of  
Dallas, County of Dallas, State of Texas, pursuant to  
Notice and the Federal Rules of Civil Procedure.

1 exposed to that specific terminology.

2 Q. When you were at CompuCom, did you refer to  
3 CRT monitors -- strike that. When you were at  
4 CompuCom, what did you refer to CRT monitors as?  
5 Would CRT monitor be the proper term?

6 A. Actually, we really just refer to them as  
7 monitors.

8 Q. Once LCD monitors were introduced, did you  
9 have a terminology that distinguished between the two? 09:10:28

10 A. Not really. Generally there was actually  
11 confusion because a monitor is a monitor and it  
12 displays information. And so as the LCDs gained in  
13 popularity, there was just a migration, but you kind  
14 of referred to everything as a monitor or display, but  
15 generally the term monitor was used.

16 Q. Did CompuCom ever purchase standalone CRTs, 09:10:56  
17 so not CRTs contained within a monitor, but standalone  
18 the part itself?

19 A. No.

20 Q. Did CompuCom only purchase CRTs, then, as a  
21 component of a finished product?

22 A. Yes, that's correct.

23 Q. Did CompuCom ever manufacture any products  
24 itself that contained CRTs?

25 A. No.

1 information?

2 A. No.

3 Q. Did CompuCom have any reason to have a  
4 preference as to which entity had manufactured the CRT  
5 in -- CRT products it purchased?

6 A. No.

7 Q. Did CompuCom ever know where the CRT within 14:31:28  
8 the CRT products it purchased was manufactured?

9 A. No.

10 Q. Did CompuCom ever know where the CRT within  
11 the CRT products it purchased was first shipped to  
12 after it had been manufactured?

13 A. No.

14 Q. Would there be a way to find that information  
15 out?

16 MR. GRALEWSKI: Objection, form.

17 A. We would have to rely on the manufacturer of 14:31:59  
18 the CRT product. They would have that information.  
19 We don't. We never pursued it. There was never a  
20 need to pursue that information to our knowledge.

21 Q. (BY MS. LIN) Do you know for the CRT  
22 products that CompuCom purchased what percentage of  
23 the purchase price is attributable to the cost of the  
24 CRT within the CRT product?

25 MR. SMITH: Objection.

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1 A. We don't have that information.

2 Q. (BY MS. LIN) Did CompuCom track its profit 14:32:40  
3 margins on its CRT product purchases?

4 A. Not directly, no.

5 Q. Was there an indirect way that CompuCom's  
6 profit margins were tracked for its CRT product  
7 purchases? 14:32:59

8 A. Indirectly, yes. In a loose sort of manner,  
9 yes.

10 Q. And how did that work?

11 A. Well, it's -- it's up to the accounting --  
12 the accounting department really to close our books  
13 every month and quarter. And they do that -- there's  
14 a variety of transactions, journal entries, and 14:33:27  
15 adjustments that occur downstream of the invoice that  
16 ultimately affect our margins on CRT returns. And --  
17 and so finance doesn't specifically -- and accounting  
18 they don't specifically look at CRTs. They look at  
19 the product business because that's how we report to  
20 our investors and our owners. 14:33:59

21 And so if there was a desire to look  
22 specifically at CRT, then there would be additional  
23 analysis to do that. And it's -- it's very labor  
24 intensive to get down and peel apart all of the  
25 finance numbers, all of that flow to look at a 14:34:27